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WILLIAM J. DOBIE

February 24, 2025

By ECF and Email

Hon. Robert Kirsch Unites States District Court District of New Jersey Clarkson S. Fisher Building & U.S. Courthouse 402 East State Street Trenton, New Jersey 08608

Re: *United States v. Aron Puretz* 24-cr-398 (RK)

Dear Judge Kirsch:

As Your Honor is well-aware this firm represents Aron Puretz, the defendant in the above-referenced matter. I apologize in advance for the last-minute nature of this application. Mr. Puretz is currently serving his sentence at FPC Otisville. This evening Mr. Puretz's son is to be married. The BOP permits an inmate a furlough to attend the religious portion of the wedding ceremony of a child. This morning, Mr. Puretz's representative was informed by the Warden that the request for a furlough was denied because in my argument against a remand in this case I noted the upcoming wedding, and Your Honor nevertheless ordered Mr. Puretz to be remanded. Thus, the BOP viewed the remand as the Court's view that it is inappropriate for Mr. Puretz to be out for the wedding.

I am informed by Mr. Puretz's representative that if the Court were to indicate that its decision to remand was not intended to opine on the grant or denial of a furlough, the BOP would permit a furlough in this matter as it routinely does in other cases. I am further informed that there is no flight-risk in Mr. Puretz's brief attendance of the wedding since he will be escorted to and from the wedding by a BOP escort who will remain there the entire time.

I have communicated with AUSA Moore and he indicated that I can represent to the Court that the government takes no position with respect to this application.

Accordingly, we respectfully request that Your Honor issue an Order that it has no objection to the BOP following its normal protocol in such matters with respect to Mr. Puretz's attendance of his son's wedding.

Respectfully submitted,

Steven V Vyrovity

cc: AUSA Babasijibomi Moore (by ECF)